

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI**

**YAZMIN GONZALEZ,**

**Plaintiff,**

**V.**

**4-23-CV-01094-RLW**

**BURGER LAW, LLC**, a Missouri Limited Liability Company and **TANPRI MEDIA & ARTS INC** aka **CONSUMER LEGAL REQUEST**, and **ELIZABETH BEAUVIL**

## Defendants.

**BURGER LAW, LLC**

## Cross Complainant

**YAZMIN GONZALEZ**

## Counter Defendant

**TANPRI MEDIA & ARTS INC, and  
ELIZABETH BEAUVIL**

## Cross Defendants

**PLAINTIFF’S RESPONSE TO DEFENDANT BURGER LAW, LLC’S  
COUNTERCLAIM**

COMES NOW, Plaintiff Yazmin Gonzalez, Pro Se, with her answer to Defendant Burger Law's Counterclaim, and states as follows:

1. Paragraph 1 of Defendant's Counterclaim does not require an answer or a response.
2. Admit.
3. Plaintiff admits she was called and marketed legal representation for Camp Lejeune victims. Plaintiff admits the calls were made by ZeroRisk.

4. Paragraph 4 of Defendant's Counterclaim does not allege facts and instead calls for a legal conclusion. Therefore, no answer or response is required.

5. Denied.

6. Admit.

7. Denied.

8. Admit that Plaintiff allowed herself to be transferred in order to find out who was making the phone calls and gave her email address in order to gain proof.

9. Admit.

10. Denied.

11. Denied

12. Denied.

13. Denied.

14. Denied. Plaintiff's allegations were true and any damage to Burger Law's reputation was the result of actions taken by Burger Law and their authorized marketing representatives.

15. Paragraph 4 of Defendant's Counterclaim does not allege facts and instead calls for a legal conclusion. Therefore, no answer or response is required.

#### **PLAINTIFF'S AFFIRMATIVE DEFENSES**

1. Plaintiff never initiated contact with Defendant Burger Law, LLC and never gave Defendant Burger Law or Cross Claimant Defendant Tanpri Media & Arts Inc. permission to call her.

WHEREFORE, Plaintiff respectfully requests the Court enter Judgment for Plaintiff against Defendant and Counter Claimant Burger Law, LLC.

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing was served on all parties via electronic mail on October 11, 2023.

Respectfully Submitted,

By: /s/ Yazmin Gonzalez

Yazmin Gonzalez  
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